

1: CV 00-1867

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

7  
10/17/00  
TA

Matthew Dix,

Plaintiff

vs.

MARTIN F. HORN, Secretary;  
William H. Harrison, J. Harvey  
Bell; and Robert S. Bittner, (D.O.C.);  
Ben Varner, Superintendent;  
Barnett; and T. Stinchfield, (SCI-  
Dallas); Frank D. Gillis,  
Superintendent; Mandie K. Lascari;  
Edmon L. Lane; Roy E. Johnson  
and Kastie, (SCI-Cattontownship);  
Joseph Chensky, Superintendent;  
Robert Shannon, and E. H. Smith,  
(SCI-Fradenville).

Defendants' .

Civil Action

No. \_\_\_\_\_

RECEIVED  
SCRANTON

SEP 29 2000

PER \_\_\_\_\_  
DEPUTY CLERK

FILED  
SCRANTON

Motion For Appointment Of Counsel OCT 12 2000

Plaintiff Matthew Dix, pursuant to 18 U.S.C. 3601(a)  
and or 42 U.S.C. § 1915(d), requests this Court to appoint  
counsel to represent him in this case for the following reasons:

1. Plaintiff is not able to afford counsel.

2. The issues involved in this case are complex  
and for this:

(a). Fact that challenges test conspiracy and  
scheme underlying a chronology of events of referral  
whereby a person is either injured in his person or  
property or deprived of ANY right or privilege of  
a citizen of the United States.

(b). The large number of defendants of whom  
are supervisory officials, presents complex legal  
issues in determining which should sufficiently  
and personally be held liable involved the constitutional  
violations.

- (c). The sheer number of claims and defendants makes this a factually complex case.
- (d). Plaintiff's inability to investigate.
- (e). Fact that medical testimony may be necessary.
- (f). Plaintiff's request for a jury trial.

3. Plaintiff are currently confined in a segregated housing unit (RHU) restricted housing unit (RH) administered custody and so has been since time MARINEL PRISON (SCIO) Jul 13, 2000, from transfer another.

4. As stated in PARAGRAPH 13, lines 12 through 16. Plaintiff confinement is pretext for punitive purpose are required to live under conditions thereof wherefore prison limits the house that he may have access, if any, to the (RH) mini Law LIBRARY.

5. Legal material contained therein are "far beyond limited" and inadequate, close to none for which prisoners housed have recently exercise in 3 to 5 days hunger strike in protest as well other wrongs continue and ongoing. Denied two prisoner's participation attendant at same time, nor an alternative system available which may enable prisoners legal assistance by other means as certified paralegal and Plaintiff are denied court access due to prison official refusal / denial to provide him writing utensil upon termination pen pencil, namely pens when ink run out of dullness required sharpen or replace pencil; unable to obtain photocoopy, etc..

6. The end of justice would best be served in this case if an ATTORNEY was appointed to represent the Plaintiff.

Dated: 9/19/2000

Plaintiff File # C-1857